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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MEDERICK LEE, LESLEE BYRNE,  
FRANCISCO ORNELAS-CARRANZA, and  
JOJIE CLOW,

Plaintiffs,

v.

UNIVERSITY MEDICAL CENTER OF  
SOUTHERN NEVADA,

Defendant.

Case No.: 2:14-CV-00328-JCM-CWH

**STIPULATION AND ORDER TO STAY  
DISCOVERY PENDING SETTLEMENT  
NEGOTIATIONS**

Plaintiffs, MEDERICK LEE, LESLEE BYRNE, FRANCISCO ORNELAS-CARRANZA, and  
JOJIE CLOW ("Plaintiffs"), and Defendant UNIVERSITY MEDICAL CENTER OF SOUTHERN  
NEVADA ("Defendant")(collectively with Plaintiffs, the "Parties"), by and through their  
respective counsel of record, hereby stipulate as follows:

**WHEREAS:**

1. This action was commenced against defendant University Medical Center of  
Southern Nevada ("UMC" or "Defendant") on March 3, 2014, alleging claims pursuant to the  
Fair Labor Standards Act, 29 U.S.C. §§ 201 et seq. Dkt. No. 1. After Plaintiffs filed their first  
amended complaint on January 23, 2015, Defendant filed its answer denying Plaintiffs'



1 factual claims, and denying Plaintiffs' allegations regarding willfulness and liquidated  
2 damages on February 23, 2015.

3 2. During the next 12 months, the Parties exchanged written discovery,  
4 attended and defended multiple depositions of key witnesses, and searched for and  
5 produced a limited number of documents in responses to discovery requests.

6 3. The Parties have since engaged in multiple meet and confers independently  
7 and pursuant to court orders, and have mutually decided to try to resolve this dispute.

8 4. The Parties are currently engaging in settlement negotiations and believe that  
9 a compromise can be reached;

10 5. The Parties jointly desire to avoid further expenditure of the Court's resources  
11 or their own resources on this litigation pending the outcome of the settlement negotiations;

12 6. To permit the opportunity to settle this action without further unnecessary  
13 litigation, the parties agree to (a) a four-week stay of discovery from March 24, 2017 to April  
14 24, 2017; and, (b) on May 1, 2017, submit a joint statement to the Court with the Parties'  
15 positions as to the progress of the negotiations.

16 NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, IT IS HEREBY  
17 STIPULATED:

18 1. All proceedings in this action are hereby stayed for four weeks, through and  
19 including April 24, 2017, pending the settlement negotiations currently being conducted by  
20 the parties; and,

21 2. On May 1, 2017, if the Parties have not yet concluded their settlement, they  
22 shall submit a status report and either a joint motion for a brief extension of the stay or a  
23 proposed schedule.

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1   **DATED:** Monday, March 27, 2017

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3   LAW OFFICES OF ANTHONY P. SGRO  
4   PATTI, SGRO & ROGER

LAW OFFICES OF STEVEN J. PARSONS

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By: /s/ Alicia S. Exley, Esq.

By: /s/ Andrew L. Rempfer, Esq.

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Alicia S. Exley, Esq.

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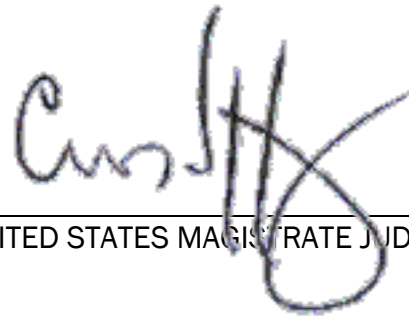


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ORDER

It is so ordered.

Dated: March 28, 2017



UNITED STATES MAGISTRATE JUDGE